# **EXHIBIT J**

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# Analysis of Infringement of U.S. Patent No. 6,725,402 by MediaTek Inc. and MediaTek USA, Inc. (Based on Public Information Only)

Plaintiff Ocean Semiconductor LLC ("Ocean Semiconductor"), provides this preliminary and exemplary infringement analysis with respect infringement of U.S. Patent No. 6,725,402, entitled "METHOD AND APPARATUS FOR FAULT DETECTION OF A PROCESSING TOOL AND CONTROL THEREOF USING AN ADVANCED PROCESS CONTROL (APC) FRAMEWORK" (the "'402 patent") by MediaTek Inc. and MediaTek USA, Inc. ("MediaTek"). The following chart illustrates an exemplary analysis regarding infringement by Defendant MediaTek's semiconductor products, systems, devices, components, and integrated circuits, and products containing such circuits, fabricated or manufactured using PDF Solutions, Inc.'s ("PDF Solutions") platforms, and/or framework, including PDF Solutions' software and APC system, including the Exensio platform hardware and/or software (collectively, "Exensio") and/or other APC system and platform hardware and/or software. Such products include, without limitation, mobile devices (e.g., Helio G, Helio A, Helio P, Helio X, mid-range 4G devices, and Google Mobile Services express devices), tablet products (e.g., MiraVision), internet of things devices (e.g., i500, i350, i300A, i300B, MT3620, MT2625, MT2621, MT2601, MT2523G, MT2523D, MT2511, MT6280, MT2502, MT5931, MT3332, MT 2503, MT3333, MT3303, MT3337, and MT3339), automotive devices (e.g., Autus I20 (MT2712) devices, Autus R10 (MT2706) devices, and Autus T10 (MT2635) devices), networking and broadband devices (e.g., MediaTek T750 MT7688A, MT7628K/N/A, MT7623N/A, MT7622, MT7621A/N, MT7620N/A, RT3662, RT3883, MT7688K, MT5932, MT8167S, MT7686, MT7682, MT7697H/HD, MT7681, MT7687F, MT7697, MT7697D, MT7601E, MT7601U, MT7603E, MT7603U, MT7610E, MT7610U, MT7612E, MT7612U, MT7615, MT7615B, MT7615S, MT7662E, MT7662U, MT7668, RT3062, RT3070, RT3562, RT3573, RT3593, RT5370, RT5572, RT5592, MT3729, MT7601, MT7610, MT7630, RT5372, RT539x, RT8070, RT2870, RT2890, RT309x, RT3290, RT3370, RT3572, RT2070, RT2760, RT2770, RT2790, and RT2860), and home devices (e.g., MT8516 SoM, MT8516, MT8507, MT8502, MediaTek C4X Development Kit for Amazon AVS, MT8516 2-Mic Development Kit for Amazon AVS, MT8516, MT8693, MT8685, MT8581, MT8580, MT8563, MT8553, MT1389/G, MT1389/J, MT1389/Q, S900 (MT9950), MT9613, MT9685, MT9602, MT5592, MT5582, MT5596, MT5597, MT5580, MT5561, MT5505, MT5398, MT5396, MT1959, MT1867, MT1865, MT1862, and MT1398), and similar systems, products, devices, and integrated circuits including, for example, products manufactured at 16nm technology node ("'402 Infringing Instrumentalities").

The analysis set forth below is based only upon information from publicly available resources regarding the '402 Infringing Instrumentalities, as MediaTek has not yet provided any non-public information.

Unless otherwise noted, Ocean Semiconductor contends that MediaTek directly infringes the '402 patent in violation of 35 U.S.C. § 271(g) by using, selling, and/or offering to sell in the United States, and/or importing into the United States, the '402 Infringing Instrumentalities. The following exemplary analysis demonstrates that infringement. Unless otherwise noted, Ocean Semiconductor further contends that the evidence below supports a finding of indirect infringement under 35 U.S.C. § 271(b) in conjunction with other evidence of liability.

Unless otherwise noted, Ocean Semiconductor believes and contends that each element of each claim asserted herein is literally met through MediaTek's provision or importation of the '402 Infringing Instrumentalities. However, to the extent that MediaTek attempts to allege that any asserted claim

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element is not literally met, Ocean Semiconductor believes and contends that such elements are met under the doctrine of equivalents. More specifically, in its investigation and analysis of the '402 Infringing Instrumentalities, Ocean Semiconductor did not identify any substantial differences between the elements of the patent claims and the corresponding features of the Infringing Instrumentalities, as set forth herein. In each instance, the identified feature of the '402 Infringing Instrumentalities performs at least substantially the same function in substantially the same way to achieve substantially the same result as the corresponding claim element.

Ocean Semiconductor notes that the present claim chart and analysis are necessarily preliminary in that Ocean Semiconductor has not obtained substantial discovery from MediaTek nor has MediaTek disclosed any detailed analysis for its non-infringement position, if any. Further, Ocean Semiconductor does not have the benefit of claim construction or expert discovery. Ocean Semiconductor reserves the right to supplement and/or amend the positions taken in this preliminary and exemplary infringement analysis, including with respect to literal infringement and infringement under the doctrine of equivalents, if and when warranted by further information obtained by Ocean Semiconductor, including but not limited to information adduced through information exchanges between the parties, fact discovery, claim construction, expert discovery, and/or further analysis.

USP No. 6,725,402	Infringement by the '402 Accused Instrumentalities				
1. A method comprising: receiving at a first interface operational state data of a processing tool related to the manufacture of a processing piece;	PDF Solutions Inc.'s ("PDF") Exensio platform ("Exensio System") receives at a first interface operational state data of a processing tool related to the manufacture of a processing piece.  For example, the Exensio System includes a first interface (e.g., platform modules including the control module (to detect and identify process or tool problems in fab and assembly in real time), the char module (to provide big data analytics on processing tools), and the ALPS module (to trace wafers, dies, and multichip modules)):				
	What is the Exensio® Platform				
	Core Platform  Scalable NoSQL big data environment - based on Cassandra Scalable parallel processing – using Spark. Including AlML analysis and automation PDF Solutions Semiconductor data model – providing analysis ready data DEXT** Global Data Exchange Network – Manufacturing ecosystem data service  Modules  Control – Detect and Identify Process or tool problems in fab and assembly in real time Test – Prevention of test issues, higher yield and reliability. Partnership with OSATs. Yield – Driving higher mfg. yields: integration of all frontend and backend data Char – Big data analytics on CViscribe/DFI data: maximizing yield and quality ALPS – Complete traceability of wafers/die/multichip modules through assembly/packaging				
	9 / PDF Solutions Confidential				
	See PDF Solutions, Inc. Overview Jefferies Conferences (Aug. 28-29, 2018) at 9, available at <a href="https://www.pdf.com/upload/File/Investors/PDFExecOveriew2018II.pdf">https://www.pdf.com/upload/File/Investors/PDFExecOveriew2018II.pdf</a> (last visited Oct. 12, 2020) ("PDF Overview") (annotated).				

The operational state data of a processing tool related to the manufacture of a processing piece received at the first interface can include data from integrated circuit design, fabrication, and sorting to assembly, testing, and system control:

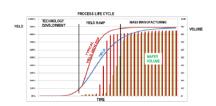
#### **PDF Solutions Products**

#### Integrated Yield Ramp Solutions:

- . What it is: Time-to-volume IP-based solution
- Business Model: Variable fee Royalty/Gainshare
- . Customer: Foundry & some leading fabless
- TAM \$200M-\$400M
- · Growth drivers:
  - · Increase in pattern-dependent & parametric yield loss
  - · Asia foundry growth, extension to memory

#### ■ Exensio<sup>®</sup> Solutions:

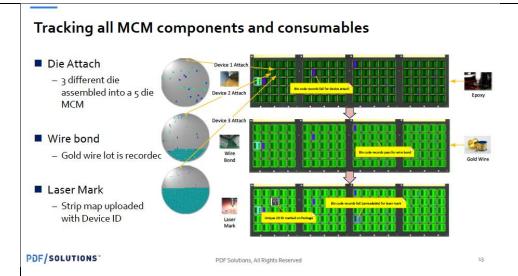
- . What it is: "Si supply chain" big data analytics platform
- Business Model: On premise or hosted subscription license model; legacy license and M&S; value-add services
- . Customer: Foundry, fabless, OSAT (esp. Test), IDM
- TAM \$150M-\$300M
- · Growth drivers:
  - · Advanced process control, AMI, adaptive test
  - Fabless need for unified system across supply chain with complete unit traceability





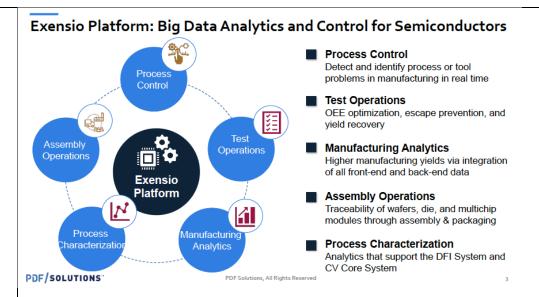
See PDF Solutions, Inc. Overview Jefferies Conferences (Aug. 28-29, 2018) at 5, available at <a href="https://www.pdf.com/upload/File/Investors/PDFExecOveriew2018II.pdf">https://www.pdf.com/upload/File/Investors/PDFExecOveriew2018II.pdf</a> (last visited Oct. 12, 2020) ("PDF Overview") (annotated).

The operational state data of a processing tool related to the manufacture of a processing piece received at the first interface can also include data associated with multi-chip module ("MCM") components and consumables that identify where a particular die is in a package, whether a particular die is wire-bonded or laser-marked, and what the device ID is for a particular chipset, etc.:



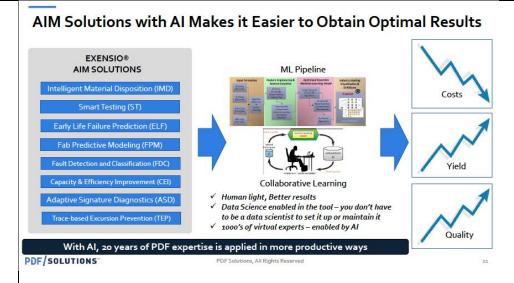
See PDF Solutions, "Cognitive End to End Analytics for Semiconductor Manufacturing: A Smart Testing Application" (Oct. 30, 2019) at 13, available at <a href="http://liralingerie.com/nldfpd/end-to-end-analytics.html">http://liralingerie.com/nldfpd/end-to-end-analytics.html</a> (last visited Oct. 12, 2020) ("Cognitive End to End Analytics Presentation").

The operational state data can cover process control, test operations, manufacturing analytics, assembly operations, and process characterization:



See S1.2—Exensio Platform, 16<sup>th</sup> Annual PDF Solutions Users Conference (Oct. 15, 2019) at 3, available at <a href="http://www.pdf.com/upload/File/Investors/PUG2019/S1.2%20PUG2019">http://www.pdf.com/upload/File/Investors/PUG2019/S1.2%20PUG2019</a> Exensio Platform Presentation") (last visited Oct. 12, 2020) (annotated).

The operational state data can also include data associated with the rule ensemble engine, spatial signature analysis, fail signature detection and analysis, product sensitivity analysis, parameter screening report, indicator screening report, and automatic spatial classification, all of which are related to the manufacture of a processing piece:



See S1.3— Machine Learning in Exensio, 16<sup>th</sup> Annual PDF Solutions Users Conference (Oct. 15, 2019) at 21, available at <a href="http://www.pdf.com/upload/File/Investors/PUG2019/S1.3%20PUG2019\_AISolutions\_JeffDavid.pdf">http://www.pdf.com/upload/File/Investors/PUG2019/S1.3%20PUG2019\_AISolutions\_JeffDavid.pdf</a> ("S1.3—Machine Learning in Exensio") (last visited Oct. 12, 2020).

The operational state data of a processing tool related to the manufacture of a processing piece can also include the following:

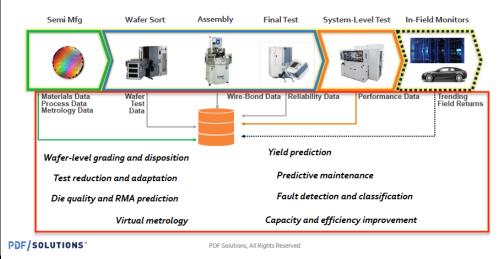
- Material descriptions (e.g., lot #, wafer #, die);
- Meta data (e.g., recipe data/time, process flow, stages, and steps);
- Fault detection and control (e.g., trace charts, model prediction, real time data collection on defects);
- Defect & metrology (e.g., lot/wafer summaries, defect summary, kill ratio, and defect images); and
- Assembly system (e.g., location of reel/tube, die traceability, and equipment parameters):

#### Data Quality - End-to-End Final Test IC Design Material External Data and Control Equipment and Meta Data (FDC) Die traceability Equipment Indicators Equipment SPC sCV testchip Equipmen Family TrackIn/Out Fab chemical Process Lot / Wafer Program Recipe Trace Charts PCM Equipment Product Operator Solder paste Wafer Sort counter data Defect Source Lot batch, vendor Rin Man Summary Lot Equipment Multi-Bin Wafer# CycleTime parameters Final Test lefect Image Wfr Counts Operator logs Module Data >100 Fab Tools Types supported, >20 Tester Types supported, >160 Assembly Tool Types supported, > 50 Data types supported PDF/SOLUTIONS PDF Solutions, All Rights Reserved See S1.2—Exensio Platform Presentation at 11 (annotated). sending the state data PDF's Exensio System sends the state data from the first interface to a fault detection unit, wherein the act of sending from the first interface to a comprises sending the state data from the first interface to a data collection unit. fault detection unit, wherein the act of sending comprises: For example, the Exensio System includes a centralized database as a data collection unit that receives the state data: sending the state data from the first interface to a data 'The Exensio database integrates, organizes, consolidates, aligns and tracks data from all process and testing data collection unit; sources. This drives fast, efficient data analysis, correlation between data sources and drill-down to tool and test data. The database genealogy fully supports lot, wafer and die level traceability from wafer start to multi-chip packaged product." See PDF Solution's The Complete Semiconductor Data Platform, available at http://pdf.com/exensio-old (last visited Oct. 12, 2020). This centralized database can also be used as a data collection unit to store fault detection and classification data: "... Dedicated centralized database — Exensio –Control provides solutions fitted to FDC requirements. The entire fab's FDC data can be stored in one single location, enabling further analyses such as trend analysis or yield excursion rootcause analysis. ... "

See Exensio Control, available at <a href="http://www.pdf.com/Exensio-Control">http://www.pdf.com/Exensio-Control</a> (last visited Oct. 12, 2020):

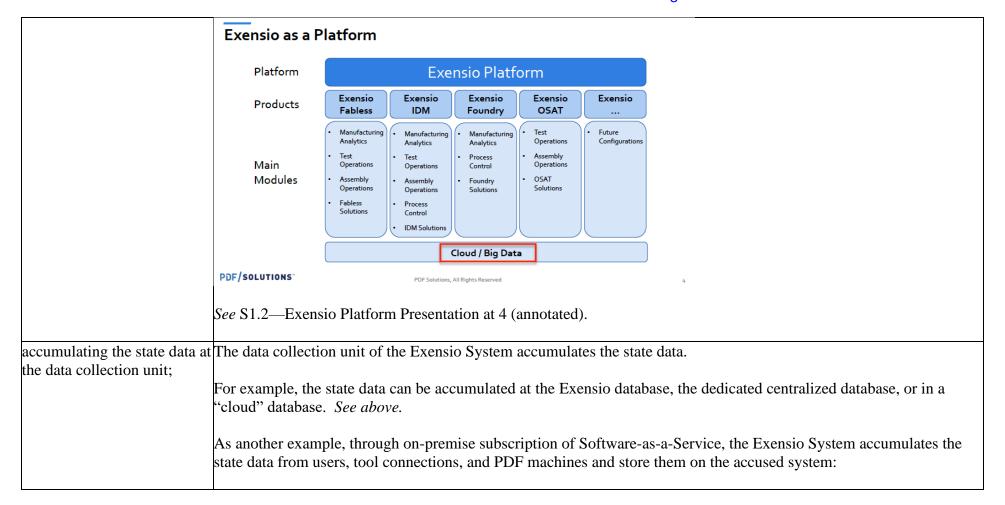
As another example, the Exensio System includes a "unified" database that receives the state data:

#### A Unified View of Semiconductor Data is Needed



See Cognitive End to End Analytics Presentation at 9.

The data collection unit also can reside in Exensio System's Design-for-Inspection ("DFI") system on the cloud:



#### **Business Model**

- Proprietary IP, software and equipment on a time-based license basis
  - On-premise subscription or SaaS
  - Scales with number of:
    - Users
  - Tool connections
  - PDF machines
  - Stored data



■ Legacy perpetual license and Gainshare-bearing contracts

12 / PDF Solutions EXTERNAL USE



See Kibarian et al., PDF Solutions, Inc. Needham Growth Conference (Jan. 16, 2019) at 12, available at <a href="https://www.pdf.com/upload/File/Investors/INVPres2019/PDFS%20investor%20presentation%2016-Jan-2019%20(final).pdf">https://www.pdf.com/upload/File/Investors/INVPres2019/PDFS%20investor%20presentation%2016-Jan-2019%20(final).pdf</a> (last visited Oct. 12, 2020) ("PDF Needham Conference Presentation").

As another example, the state data can be accumulated at a dedicated centralized data configured to store FDC-related state data:

"Exensio – Control is a scalable Fault Detection and Classification (FDC) software solution that controls semiconductor manufacturing equipment and processes. Exensio-Control allows manufacturers to accurately detect and identify process or tool problems that arise during production, in real-time.

. . .

• Dedicated centralized database — Exensio –Control provides solutions fitted to FDC requirements. The entire fab's FDC data can be stored in one single location, enabling further analyses such as trend analysis or yield excursion root-cause analysis. ..."

See Exensio Control, available at <a href="http://www.pdf.com/Exensio-Control">http://www.pdf.com/Exensio-Control</a> (last visited Oct. 12, 2020).

translating the state data from a first communications protocol to a second communications protocol compatible with the fault detection unit;

PDF's Exensio System translates the state data from a first communications protocol to a second communications protocol compatible with the fault detection unit.

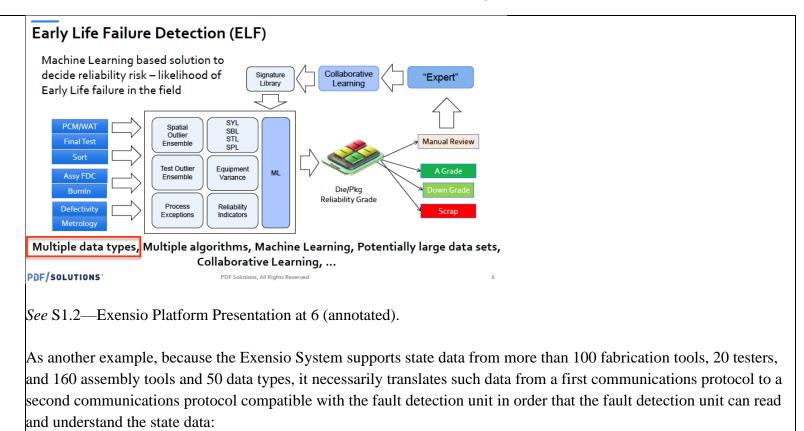
As an example, the Exensio System translates the state data from a first communications protocol to a second communications protocol compatible with the fault detection unit as part of the "signal transformation and summarization process" such that it can acquires "all the equipment and logistics data for FDC analysis, in any format and from any source":

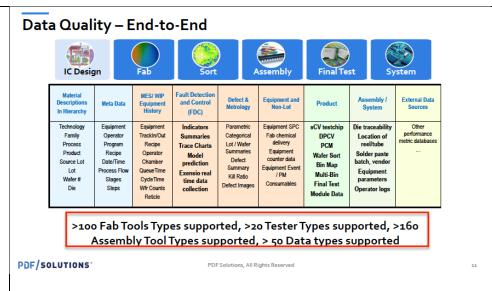
"Exensio –Control is a scalable Fault Detection and Classification (FDC) software solution that controls semiconductor manufacturing equipment and processes. Exensio-Control allows manufacturers to accurately detect and identify process or tool problems that arise during production, in real-time.

- Wide data acquisition capabilities Exensio –Control acquires all the equipment and logistics data for FDC analysis, in any format and from any source (Interface A, databases, SECS/HSMS, automation, files, etc.)
- Advanced analysis capabilities Exensio —Control includes signal transformation and summarization, univariate SPC, multivariate fault detection and classification functions, plus meta-analysis based on indicators. In addition, Exensio —Control provides off-line and historical analysis capabilities to test FDC control strategies before deployment.
- Real-time alarms and events management Exensio —Control centralizes and assesses events and alarms to trigger the appropriate action. Equipment alarms and events are overlaid with trace and univariate SPC charts and can be analyzed in conjunction with FDC alarms. ... "

See Exensio Control, available at http://www.pdf.com/Exensio-Control (last visited Oct. 12, 2020).

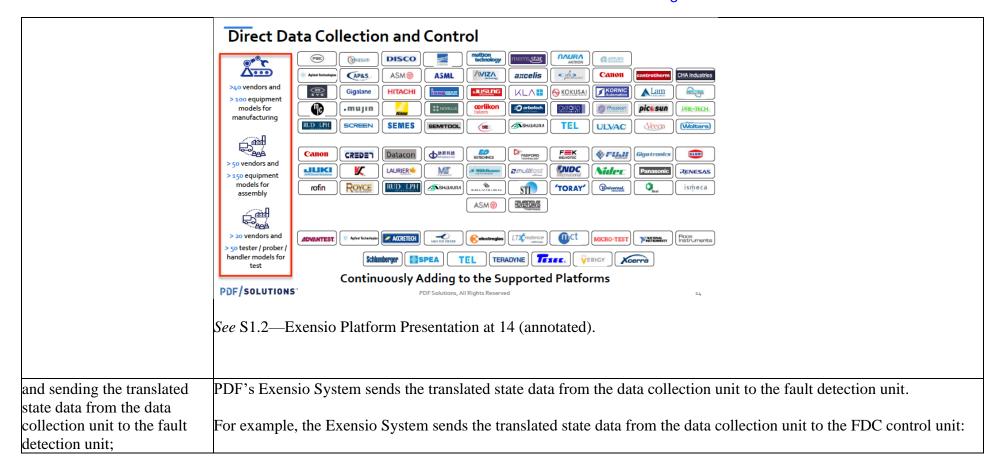
As another example, because the Exensio System accepts multiple data types and/or formats of the state data, it necessarily translates these data types from a first communications protocol to a second communications protocol compatible with the fault detection unit in order that the fault detection unit can read and understand the state data:

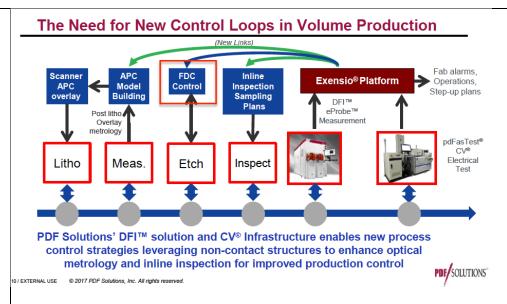




See S1.2—Exensio Platform Presentation at 11 (annotated).

As yet another example, because the Exensio System supports state data from more than 100 equipment models for manufacturing, 150 equipment models for assembly, and 50 testers, probers, and handler models for test, it necessarily translates such data from a first communications protocol to a second communications protocol compatible with the fault detection unit in order that the fault detection unit can read and understand the state data:





See PDF Solutions Investor Presentation (Nov. 2017) at 10, available at <a href="http://www.pdf.com/upload/File/Investors/PDFInvestor%20Presentation%20November%202017.pdf">http://www.pdf.com/upload/File/Investors/PDFInvestor%20Presentation%20November%202017.pdf</a> (last visited Oct. 12, 2020) ("2017 Investor Presentation") (annotated).

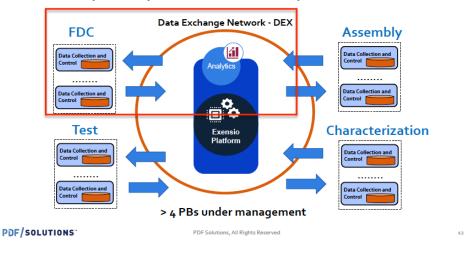
As another example, the Exensio System sends the translated state data from the data collection unit to the fault detection unit via the AIM YieldAware FDC platform:

"Software Related Services – We provide software maintenance and support (or M&S), data management services, various value-added services (or VAS) to install, configure, or create analysis templates, and other professional services to achieve customers' specific outcomes using our software. We call this last type of services our AIM solutions and, in these cases, we tailor the user flows of one or more Exensio products to achieve a desired result. For example, our AIM YieldAware<sup>TM</sup> FDC offering is designed to identify the process control variables that have the greatest impact on product yield through professional services that analyze the data from both Exensio Control and elements of Exensio Yield and make recommendations for the customer to implement. VAS are provided by our professional service personnel with expertise that enhances and complements the engineering teams at our customers. For example, VAS includes our data cleaning and monitoring services. One requirement of big data analytics is to have clean, harmonized data to analyze. This service offering outsources the data wrangling and management effort to free the customer to focus their efforts on analysis, which has a greater ROI to the company than data management."

See PDF Solutions Inc.'s Form 10-K (filed Mar. 10, 2020) at 8, available at <a href="http://ir.pdf.com/static-files/fb23407a-dfbc-489f-adb1-ac54e83102ad">http://ir.pdf.com/static-files/fb23407a-dfbc-489f-adb1-ac54e83102ad</a> (last visited Oct. 12, 2020) ("2020 Form 10-K").

As another example, the Exensio System sends the translated state data from the data collection unit to the fault detection unit via the Data Exchange Network ("DEX"):

### Data Quality – Completeness/Consistency – Data Collection/DEX



See S1.2—Exensio Platform Presentation at 12 (annotated).

determining if a fault condition exists with the processing tool based upon the state data received by the fault detection unit;

PDF's Exensio System determines if a fault condition exists with the processing tool based upon the state data received by the fault detection unit.

As an example, the Exensio System is adapted to receive monitor and identify a fault condition covering various process parameters of the processing tool:

"• Exensio Control – This software provides failure detection and classification (or FDC) capabilities for monitoring, alarming and control of manufacturing tool sets. These capabilities include proprietary data collection and analysis of tool sensor trace data and summary indicators designed to rapidly identify sources of process variations and manufacturing excursions. When used together with Exensio Yield and related modules, the accretive data mining and

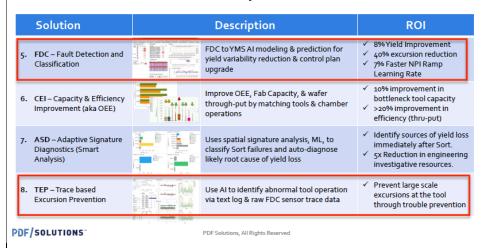
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correlation capabilities are designed to enable identification of tool level sources of yield loss and process variation that impact end of line product yield, performance and reliability."

See 2020 Form 10-K at 7.

As another example, the Exensio System determines if a fault condition exists with the processing tool based upon the state data received by the fault detection unit to improve yield and prevent large scale excursions at the tool:

### AIM Solutions Overview (Foundry/IDM)



See S1.3— Machine Learning in Exensio, 16<sup>th</sup> Annual PDF Solutions Users Conference (Oct. 15, 2019) at 19, available at <a href="http://www.pdf.com/upload/File/Investors/PUG2019/S1.3%20PUG2019\_AISolutions\_JeffDavid.pdf">http://www.pdf.com/upload/File/Investors/PUG2019/S1.3%20PUG2019\_AISolutions\_JeffDavid.pdf</a> ("S1.3—Machine Learning in Exensio") (last visited Oct. 12, 2020).

As another example, the Exensio System determines if a fault condition (e.g., whether a sensor detects abnormality) exists with the processing tool:

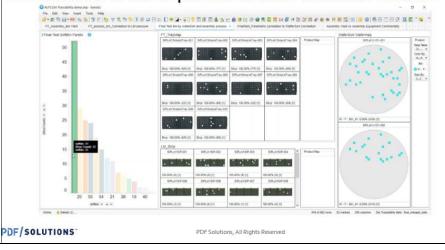
# FDC – RESULTS on Large Volume of Production Wafers Across Multiple Process Steps

Process Step	True Positive Rate (actual = normal, prediction = normal)	True Negative Rate (actual = abnormal, prediction = abnormal)	  -	produced accurate model for multiple processes  No user modification of algorithm settings from process to process  Many tools and recipes per process step
Process Step 1	100.00%	100.00%		
Process Step 2	99.82%	99.90%		
Process Step 3	97.12%	99.38%		
Process Step 4	99.86%	99.23%		2000
<ul> <li>✓ Data Science enabled in the tool – you don't have to be a data scientist to set it up or maintain it</li> <li>✓ 1000's of virtual experts – enabled by AI</li> <li>✓ Better IP security – distributed knowledge remains in the tool itsel</li> </ul>				1150 1500 1500 Red bumps represent abnormal
PDF/solutions		PDF Solutions, All Rights Reserved		0 10 20 30 40 50 60

See S1.3—Machine Learning in Exensio at 23.

As another example, the Exensio System determines that a fault condition exists with the processing tool based on the failed patterns on the wafers:

## Identification of failure pattern on wafer from final test fails



See Cognitive End to End Analytics Presentation at 9. performing a predetermined PDF's Exensio System performs a predetermined action on the processing tool in response to the presence of a fault action on the processing tool condition. in response to the presence of a fault condition; and As an example, the Exensio System is adapted to control the processing tools or manufacturing tool sets to take corrective actions in response to a fault condition: '• Exensio Control – This software provides failure detection and classification (or FDC) capabilities for monitoring, alarming and control of manufacturing tool sets. These capabilities include proprietary data collection and analysis of tool sensor trace data and summary indicators designed to rapidly identify sources of process variations and manufacturing excursions. When used together with Exensio Yield and related modules, the accretive data mining and correlation capabilities are designed to enable identification of tool level sources of yield loss and process variation that impact end of line product yield, performance and reliability." See 2020 Form 10-K at 7. As another example, the Exensio System adjusts processing of the processing tool by updating recipe tables and processing/tool parameters in response to the presence of a fault condition: Model training and prediction pipeline Data Preparation & Feature generation Feature Selection Model Training / Execution Relabel Multivariate **AUC feature** targets to Parameter feature Training selection + feature selection for reduce class Final mode Prediction Grouping feature output to folder Handle incomplete data (retests etc) · Tree-based classifiers Smart Clip extreme values & impute missing data Proximity based classifiers Testing · Remove highly correlated features Linear classifiers Methodology \* Adjust to shifting input data schema

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PDF/SOLUTIONS"

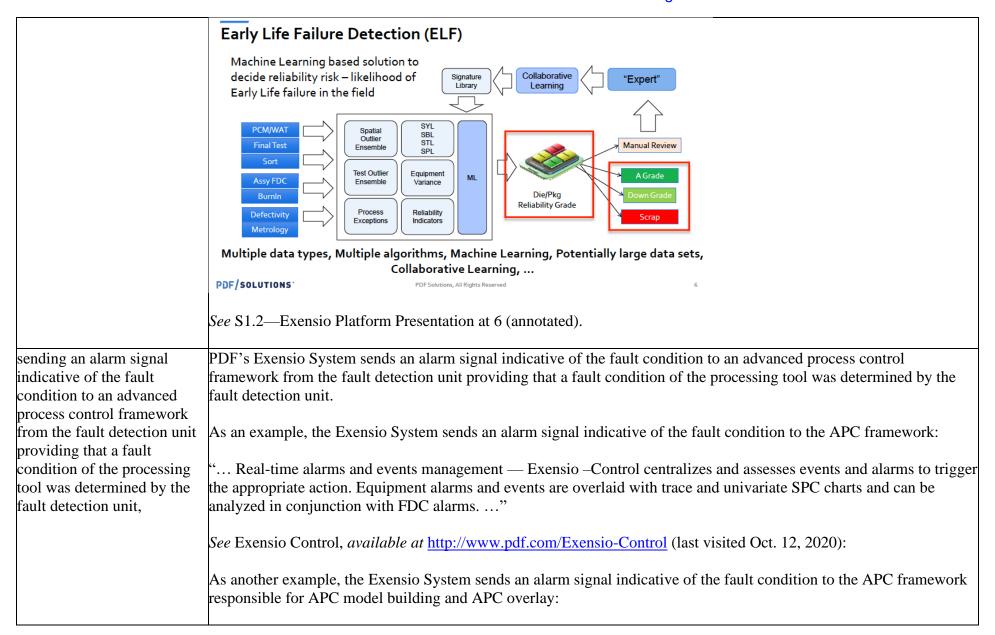
See Cognitive End to End Analytics Presentation at 20 (annotated).

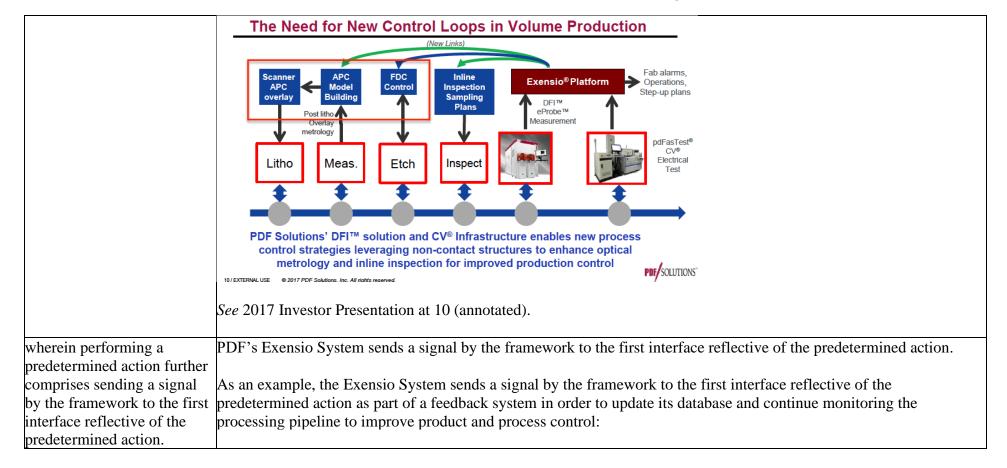
As another example, the Exensio System adjusts the lithography, measurement, etching, or inspection parameters of the processing tool:

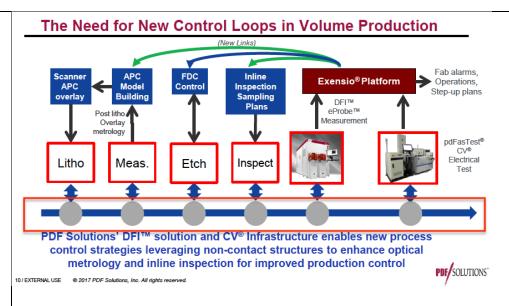
#### The Need for New Control Loops in Volume Production FDC Inline Exensio® Platform Operations, Control APC Inspection Step-up plans overlay Sampling DFI™ Plans eProbe™ Measurement Overlay pdFasTest® Electrical Litho Meas. Etch Inspect Test PDF Solutions' DFI™ solution and CV® Infrastructure enables new process control strategies leveraging non-contact structures to enhance optical metrology and inline inspection for improved production control PDF SOLUTIONS 10 / EXTERNAL USE @ 2017 PDF Solutions. Inc. All rights reserved.

See 2017 Investor Presentation at 10 (annotated).

As another example, the Exensio System controls the processing tool to downgrade or scrape the die/package that contains the fault condition:

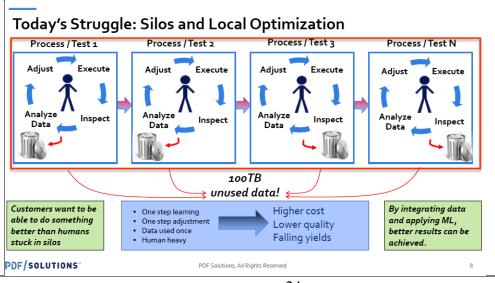






See 2017 Investor Presentation at 10 (annotated).

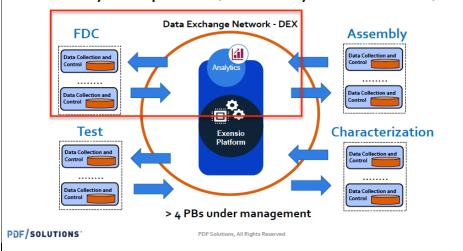
As another example, the Exensio System sends a signal by the framework to the first interface reflective of the predetermined action as part of the "inspect-analyze data-adjust-execute" methodology to continually identify and resolve manufacturing issues:



See Cognitive End to End Analytics Presentation at 8.

As another example, the Exensio System a signal by the framework to the first interface reflective of the predetermined action via the Data Exchange Network ("DEX"):

# Data Quality – Completeness/Consistency – Data Collection/DEX



See S1.2—Exensio Platform Presentation at 12 (annotated).